

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO,  
*et al.*

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**SUPPLEMENT TO URGENT MOTION TO COMPEL THE  
PUERTO RICO DEPARTMENT OF TREASURY  
TO COMPLY WITH THE FIRST AND SECOND AMENDED ORDERS  
SETTING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PROFESSIONAL**

The Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “**Retiree Committee**”), respectfully files this supplement (the “**Supplement**”) to the Retiree Committee’s urgent motion (“**Motion**”) for entry of an order directing the Puerto Rico Department of Treasury, part of the Commonwealth’s central government (“**Hacienda**”)<sup>2</sup> to comply with this

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<sup>1</sup> The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747).

<sup>2</sup> Hacienda is represented by counsel to AAFAF. In communications with counsel before the expiration of the original filing deadline of July 3, 2018 for matters on the July 25, 2018 omnibus hearing docket, counsel represented that it would not object to this Motion being set for hearing for the July 25, 2018 omnibus hearing date.

Court's First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 1715] (the "**First Amended Interim Compensation Order**") and the Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 3269] (the "**Second Amended Interim Compensation Order**, together with the First Amended Interim Compensation Order, the "**Interim Compensation Orders**").

1. The Retiree Committee filed the Motion on July 13, 2018.<sup>3</sup> [Dkt. 3513.] In the Motion, the Retiree Committee sought entry of an Order: (a) directing Hacienda to comply with the Interim Compensation Orders and to pay to the Retiree Committee's Professionals, on or before July 31, 2018, all fees and expenses due under the Interim Compensation Orders; and (b) directing Hacienda to remit the withholdings erroneously applied to the stateside Retiree Committee's Professionals and Marchand on or before July 31, 2018.

2. Since filing the Motion, the Retiree Committee Professionals have received partial payments of various past-due amounts. However, the Retiree Committee Professionals are still owed substantial amounts that are significantly past-due and/or represent amounts unpaid due to an erroneous application of withholding taxes by Hacienda, as discussed in the Motion.

3. The Retiree Committee Professionals have provided Hacienda with updated schedules of all amounts currently due, and will continue to engage with Hacienda and its counsel to resolve the issues presented by the Motion. Nevertheless, in light of the amounts still outstanding, the Retiree Committee submits that the Motion should go forward as scheduled for the July 25, 2018 omnibus hearing date.

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<sup>3</sup> Capitalized words used herein and not defined shall have the meaning given to them in the Motion.

July 19, 2018

JENNER & BLOCK LLP

By:

/s/ Robert Gordon

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BENNAZAR, GARCÍA & MILIÁN, C.S.P.

By:

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